Casey R. Fronk (Admitted *pro hac vice*) 1 Laurie E. Abbott (Admitted *pro hac vice*) Securities and Exchange Commission 2 351 South West Temple, Suite 6.100 Salt Lake City, UT 84101-1950 3 Tel.: (801) 524-5796 FronkC@sec.gov abbottla@sec.gov 5 Attorneys for Plaintiff 6 7 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 8 9 SECURITIES AND EXCHANGE Case No.: 2:19-cv-590-RFB-DJA COMMISSION 10 11 Plaintiff, PLAINTIFF'S MOTION FOR ENTRY OF FINAL JUDGMENTS AS TO v. 12 **DEFENDANTS BOHNSACK AND** 13 ALEXANDER BEVIL, an individual; **BROYLES** RICHARD MCCALL BOHNSACK, an 14 individual; DANIEL THOMAS BROYLES, an individual; CHARLES CARY DAVIS, an Judge Richard F. Boulware 15 Magistrate Judge Daniel J. Albregts individual; WILLIAM JAMES ROTH, an 16 individual; GLENN JOSEPH STORY, an individual; and HAROLD WASSERMAN, an 17 individual. 18 Defendants. 19 20 Pursuant to the Court's September 29, 2021 minute order granting a default judgment as 21 to Defendant Daniel Thomas Broyles ("Broyles"), and the Court's November 30, 2020 order 22 granting plaintiff's motion for civil penalties as to Defendant Richard McCall Bohnsack 23 ("Bohnsack"), Plaintiff Securities and Exchange Commission ("Commission") moves for entry 24 25 of final judgments against Bohnsack and Broyles in the form attached hereto as Exhibits 1 and 2. 26 In support of this motion, the Commission states as follows: 27

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- 1. Defendant Bohnsack, near the outset of this action, agreed to a consent judgment under which the Commission would be awarded its requested injunctive relief, and the Court would have discretion to award a civil penalty as to Bohnsack upon the Commission's motion.

  (See Dkt. Nos. 8, 13.) Pursuant to that consent judgment, the Commission moved for civil penalties as to Bohnsack on December 6, 2019. (Dkt. No. 42.) The Court granted the Commission's motion, and imposed civil penalties of \$5,000 upon Bohnsack, on November 30, 2020. (Dkt. No. 51.) However, the Court has not yet entered a final judgment as to Bohnsack which incorporates both the injunctive relief agreed to in the consent judgment and the \$5,000 civil penalty ordered by the Court.
- 2. Thus, the Commission submits the attached proposed Final Judgment as to Bohnsack (*see* Ex. 1), which includes both the injunctive relief ordered by the court in the consent judgment and the \$5,000 civil penalty granted upon the Commission's motion. Entry of the proposed final judgment will conclude the action as to Bohnsack.
- 3. On September 29, 2021, the Court granted the Commission's renewed motion for a default judgment against Defendant Broyles, and requested that the Commission submit a proposed Final Judgment as to Broyles by October 12, 2021. (*See* Dkt. No. 56, Minute Order.) Attached hereto as Exhibit 2 is a proposed Final Judgment as to Broyles, which would conclude this action as to Broyles.

WHEREFORE, the Commission respectfully requests that the Court enter the attached proposed Final Judgments as to Defendants Bohnsack and Broyles. Entry of both of these final judgments will conclude the action as to all defendants.

DATED this 1st day of October, 2021.

Respectfully submitted,

/s/ Casey R. Fronk

Casey R. Fronk
Laurie E. Abbott
Securities and Exchange Commission

CERTIFICATE OF SERVICE I hereby certify that on this 1st day of October, 2021, I caused to be served a true and correct copy of the foregoing PLAINTIFF'S MOTION FOR ENTRY OF FINAL JUDGMENTS AS TO DEFENDANTS BOHNSACK AND BROYLES via the method indicated below upon the following: Glenn Joseph Story Richard McCall Bohnsack: 1916 Cherbourg Drive 6101 Saintsbury Drive, Apt 323 Plano, TX 74074 The Colony, TX 75056 acaglenn@hotmail.com Pro Se Defendant Pro Se Defendant VIA FIRST CLASS MAIL VIA FIRST CLASS MAIL /s/ Casey R. Fronk Casey R. Fronk